



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 7/12/02
Time Start 12:50 pm
Time Finish 2:00 pm

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name B. Braun Medical, Inc. I.D. Number PAD 982679169
Site Address 901 Marcon Blvd. Allentown, PA 18109 - 9341
County Lehigh Municipality Hanover Twp. Zip 18109
Name of Inspector Chris Smolar
Name & Title of Responsible Official Steve Stancick Environmental, Health, and Safety Manager
Person Interviewed David Lauer / Joe Patterson Telephone (610) 266-0500 x2584 / x2454
Mailing Address (if different from above) Same
Amount of Hazardous Waste Generated per Month: >2200 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other
PBR: ☐ Neutralization/WWTP ☐ Reclaim (silver) Other
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types Fluorescent Lamps

3. Hazardous Waste Transporters:

Transporter Name Freehold Cartage License Number PA-AH 0067
Transporter Name Dart Trucking License Number PA-AH 0219
Transporter Name Safety Kleen Systems License Number PA-AH 0172

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, F002, F003	Waste flammable solids and liquids (solvents)	Environmental Enterprises
D001, F002, F003	Waste flammable solids and liquids (solvents)	Von Roll of America
D001, D002, F002	Lab Wastes	Permafix

NERO
BDO

EPA - RCRA

Municipality - Hanover Twp.
Facility - B. Braun Medical

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 07/12/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENTPA CIT.
25 PA CodeFED. CIT.
40 CFRLINE
NO.

1			Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1			Identification Number	262a.10	262.12	H002
1			Authorized transporters only	262a.10	262.12(c)	H003
1			Subsequent notification requirements met	262a.12(b)		H004
1			Proper manifest used	262a.10	262.21	H005
1			Manifests filled out correctly and completely	262a.20		H006
1			Manifests signed and routed properly	262a.23(a)	262.23	H007
1			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	2		SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	2		SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
1			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
1			Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
1			Specified records retained for three years	262a.10	262.40(c)	H014
1			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
1			Exception reporting procedures followed	262a.42	262.42	H016
1			Spill reporting procedures followed	262a.10	262.34(d)	H017
1			PPC plan developed and implemented	262a.10	262.34(a)	H018
1			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
1			Source reduction strategy prepared and available (LQG only)	262a.100		H020
1			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 07/12/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENTPA CIT.
25 PA CodeFED CIT.
40 CFRLINE
NO.

				CONTAINERS (Subchapter I)			
1				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
1				Containers of hazardous waste in good condition	265a.1	265.171	H026
1				Containers and stored waste compatible	265a.1	265.172	H027
1				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
1				Containers managed to prevent leaks	265a.1	265.173(b)	H029
1				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
1				Container storage areas inspected at least weekly	265a.1	265.174	H031
1				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
1				Proper containment and collection systems in place	265a.179		H033
1				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
1				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
1				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
1				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection July 12, 2002 Identification Number PAD 982679169
Company/Facility/Site Name B. Braun Medical, Inc.

Observations:

I conducted a routine hazardous waste generator inspection on 07/12/02 at B. Braun Medical, Inc. David Lauer and Joe Patterson of B. Braun were present during the inspection. The inspection began at 10:50 am.

The facility manufactures medical equipment. The facility generates hazardous and residual wastes during this process. The facility main generates used solvents as hazardous waste. The facility also generates lab waste. The facility's hazardous waste include, but are not limited to, Isopropanol, Methylene Chloride, Ethanol, Butyl Acetate, TCE, and Phenol. The facility generates liquid hazardous waste, and some solid wastes, which mostly include protective equipment.

Two containers of hazardous waste were observed inside. In what appeared to be an accumulation area, and several drums were observed outside in a hazardous waste storage area. Both areas had secondary containment. Drums were properly labeled with dates. The drums were in good condition. The drums should be labeled with the name of the hazardous constituent whenever possible. Some of the drums just had a description of the waste type. The storage shed was equipped with fire systems. The containment pad outside had a couple of very small cracks, but these should be patched before they grow bigger.

The PPC plan was examined. The plan appears to be adequate. Manifests were examined and appear to be in order. The training documents were examined. The facility has submitted its biennial reports (hazardous). A copy of the LDR was seen attached to one of the manifest shipments.

No violations were noted during the inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Sent to Facility Date 7/16/02
Inspector (signature) Christopher Amick Date 7/16/02



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

eFACTS10# 1279555

Inspection Date 10/20/03

Time Start 12:45 pm

Time Finish 1:45 pm

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name B. Braun Medical, Inc. I.D. Number PAD 982679169
 Site Address 901 Marcon Blvd. Allentown, PA 18109 - 9341
 County Lehigh Municipality Hanover Twp. Zip 18109
 Name of Inspector Chris Smolar
 Name & Title of Responsible Official Steve Stancick Environmental, Health, and Safety Manager
 Person Interviewed David Lauer / Joe Patterson Telephone (610) 266-0500 x2584 / x2454
 Mailing Address (if different from above) Same
 Amount of Hazardous Waste Generated per Month: >2200 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other
 PBR: ☐ Neutralization/WWTP ☐ Reclaim (silver) Other
 GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types Fluorescent Lamps

3. Hazardous Waste Transporters:

Transporter Name Freehold Cartage License Number PA-AH 0067
 Transporter Name Dart Trucking License Number PA-AH 0219
 Transporter Name Safety Kleen Systems License Number PA-AH 0172

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, F002, F003	Waste flammable solids and liquids (solvents)	Environmental Enterprises
D001, F002, F003	Waste flammable solids and liquids (solvents)	Von Roll of America
D001, D002, F002	Lab Wastes	Permafex

NERO

BDO

EPA - RCRA

Municipality - Hanover Twp.

Facility - B. Braun Medical

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 10/20/03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENTPA CIT.
25 PA CodeFED. CIT.
40 CFRLINE
NO.

1			Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1			Identification Number	262a.10	262.12	H002
1			Authorized transporters only	262a.10	262.12(c)	H003
1			Subsequent notification requirements met	262a.12(b)		H004
1			Proper manifest used	262a.10	262.21	H005
1			Manifests filled out correctly and completely	262a.20		H006
1			Manifests signed and routed properly	262a.23(a)	262.23	H007
1			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	2		SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	2		SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
1			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
1			Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
1			Specified records retained for three years	262a.10	262.40(c)	H014
1			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
1			Exception reporting procedures followed	262a.42	262.42	H016
1			Spill reporting procedures followed	262a.10	262.34(d)	H017
1			PPC plan developed and implemented	262a.10	262.34(a)	H018
1			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
1			Source reduction strategy prepared and available (LQG only)	262a.100		H020
1			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 10/20/03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS**1 2 3 4****REQUIREMENT****PA CIT.
25 PA Code****FED CIT.
40 CFR****LINE
NO.**

				CONTAINERS (Subchapter I)			
1				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
1				Containers of hazardous waste in good condition	265a.1	265.171	H026
1				Containers and stored waste compatible	265a.1	265.172	H027
1				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
1				Containers managed to prevent leaks	265a.1	265.173(b)	H029
1				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
1				Container storage areas inspected at least weekly	265a.1	265.174	H031
1				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
1				Proper containment and collection systems in place	265a.179		H033
1				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
1				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
1				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
1				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection October 20, 2003 Identification Number PAD 982679169Company/Facility/Site Name B. Braun Medical, Inc.**Observations:**

I conducted a routine hazardous waste generator inspection on 10/20/03 at B. Braun Medical, Inc. Steve Stancick, David Lauer and Joe Patterson of B. Braun were present during the inspection. The inspection began at 12:45 pm.

The facility manufactures medical equipment. The facility generates hazardous and residual wastes during this process. The facility main generates used solvents as hazardous waste. The facility also generates lab waste. The facility's hazardous waste include, but are not limited to, Isopropanol, Methylene Chloride, Ethanol, Butyl Acetate, TCE, and Phenol. The facility generates liquid hazardous waste, and some solid wastes, which mostly include protective equipment. The facility also generates lab packs, but none were seen onsite during the inspection.

Only one container of hazardous waste was observed in the satellite accumulation area. The drum was properly labeled and had secondary containment. The drum was in good condition. The hazardous waste storage area a few drums. All were properly labeled, had a start date and proper secondary containment. No leaks were observed. No liquid was seen in the secondary containment. The storage area was equipped with fire systems. The oldest date on a drum seen was 9/22/03.

The PPC plan was examined. The plan appears to be adequate. Manifests were examined and appear to be in order. The facility just recently had a pickup, so the amount of waste onsite is low. The training documents were examined. Training for hazardous waste handling was completed in October 2002. New training is scheduled to be done within two weeks. The facility had no new hazardous waste streams in 2003.

The hazardous and residual biennial reports (2001 and 2002) were examined and appear to be in order. The source reduction strategy was also on file at the facility.

No violations were noted during the inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Scot to Facility

Date

10/22/03

Inspector (signature)

Christy Ann

Date

10/22/03



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 12/10/02

Time Start 11:20 am

Time Finish 12:35 pm

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name B. Braun Medical, Inc. I.D. Number PAD 982679169

Site Address 901 Marcon Blvd. Allentown, PA 18109 - 9341

County Lehigh Municipality Hanover Twp. Zip 18109

Name of Inspector Chris Smolar

Name & Title of Responsible Official Steve Stancick Environmental, Health, and Safety Manager

Person Interviewed David Lauer / Joe Patterson Telephone (610) 266-0500 x2584 / x2454

Mailing Address (if different from above) Same

Amount of Hazardous Waste Generated per Month: >2200 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad OtherPBR: ☐ Neutralization/WWTP ☐ Reclaim (silver) OtherGENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types Fluorescent Lamps

3. Hazardous Waste Transporters:

Transporter Name Freehold Cartage License Number PA-AH 0067

Transporter Name Dart Trucking License Number PA-AH 0219

Transporter Name Safety Kleen Systems License Number PA-AH 0172

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, F002, F003	Waste flammable solids and liquids (solvents)	Environmental Enterprises
D001, F002, F003	Waste flammable solids and liquids (solvents)	Von Roll of America
D001, D002, F002	Lab Wastes	Permafix

NERO

BDO

EPA - RCRA

Municipality - Hanover Twp.

Facility - B. Braun Medical

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 12/10/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENTPA CIT.
25 PA CodeFED. CIT.
40 CFRLINE
NO.

1			Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1			Identification Number	262a.10	262.12	H002
1			Authorized transporters only	262a.10	262.12(c)	H003
1			Subsequent notification requirements met	262a.12(b)		H004
1			Proper manifest used	262a.10	262.21	H005
1			Manifests filled out correctly and completely	262a.20		H006
1			Manifests signed and routed properly	262a.23(a)	262.23	H007
1			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	2		SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	2		SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
1			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
1			Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
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1			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
1			Exception reporting procedures followed	262a.42	262.42	H016
1			Spill reporting procedures followed	262a.10	262.34(d)	H017
1			PPC plan developed and implemented	262a.10	262.34(a)	H018
1			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
1			Source reduction strategy prepared and available (LQG only)	262a.100		H020
1			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 07/12/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENT

PA CIT.
25 PA Code

FED CIT.
40 CFR

LINE
NO.

					CONTAINERS (Subchapter I)		
1					Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34 H025
1					Containers of hazardous waste in good condition	265a.1	265.171 H026
1					Containers and stored waste compatible	265a.1	265.172 H027
1					Containers kept closed except during addition or removal of wastes	265a.1	265.173(a) H028
1					Containers managed to prevent leaks	265a.1	265.173(b) H029
1					Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173	H030
1					Container storage areas inspected at least weekly	265a.1	265.174 H031
1					Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177 H032
1					Proper containment and collection systems in place	265a.179	H033
1					Air emission standards complied with (AA, BB, CC)	265a.1	265.178 H034
1					Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2) H035
1					Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3) H036
1					Containers labeled accurately identify contents	SWMA 6018.403(b) (2)	H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection December 10, 2002 Identification Number PAD 982679169
Company/Facility/Site Name B. Braun Medical, Inc.

Observations:

I conducted a routine hazardous waste generator inspection on 12/10/02 at B. Braun Medical, Inc. Steve Stancick, David Lauer and Joe Patterson of B. Braun were present during the inspection. The inspection began at 11:20 am.

The facility manufactures medical equipment. The facility generates hazardous and residual wastes during this process. The facility main generates used solvents as hazardous waste. The facility also generates lab waste. The facility's hazardous waste include, but are not limited to, Isopropanol, Methylene Chloride, Ethanol, Butyl Acetate, TCE, and Phenol. The facility generates liquid hazardous waste, and some solid wastes, which mostly include protective equipment.

One containers of hazardous waste was observed in the satellite accumulation area. The drum was properly labeled and had secondary containment. The drum was in good condition. The hazardous waste storage area also had one drum. The drum was properly labeled, had a start date and proper secondary containment. No leaks were observed. No liquid was seen in the secondary containment. The storage area was equipped with fire systems.

One of the lab areas was examined. Lab pack waste is generated here. The facility labels the container and has a log sheet to list whatever is dumped into the lab pack.

The PPC plan was examined. The plan appears to be adequate. Manifests were examined and appear to be in order. The facility just had a pick up on 12/8/02. The training documents were examined. Training for hazardous waste handling was completed in October 2002. The facility's inspection logs were examined and appear to be in order. Some of the facility's waste profiles were examined.

No violations were noted during the inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____
Inspector (signature) _____ Date _____



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 02/20/2001Time Start 1:50 (3PM)Time Finish 03/12/2001
(1300) 1PM

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name B Brown Medical, Inc. I.D. Number PAD 982679169Site Address 901 Mazon Blvd. Allentown, PA 18103-9341County Lehigh Municipality Hanover Twp Zip 18103-9341Name of Inspector Stephen PurzioName & Title of Responsible Official Edward Brack, Senior Vice President of ManufacturingPerson Interviewed Stephen S. Shannick, E.H.S. Manager Telephone (610) 266-0500Mailing Address (if different from above) sameAmount of Hazardous Waste Generated per Month: >2200* Pounds Kgs

1. Site Characterization:

* periodic generator

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other PSR: ☒ Neutralization/WWTP ☐ Reclaim Other GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large-Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types fluorescent lamps

3. Hazardous Waste Transporters:

Transporter Name Freehold Cartage, Inc. License Number PA-AH 0067Transporter Name Dart Trucking Company License Number PA-AH 0219Transporter Name Schubert Kline Systems License Number PA-AH 0172

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001	waste solvent and hydraulic fluid from equipment	Chemical Corporation of GA RAD 093380814
F002, F003	solvent rags with	Van Ball America
D001	Waste from chemical	OHIO 980613541
D001, D002	Waste from onsite lab	Environmental Enterprises
F003, F004		OHIO 083377010
U044, U057		
* See 1999 Biennial Report for other waste streams		

NERO

BDO via C. Gitschier

HBG Control Office

USEPA ✓

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS – SMALL QUANTITY GENERATORS

Site Name B Brown Medical ID Number PAD982679169 Date 02/20/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1				Identification Number	262a.10	262.12	H002
1				Authorized transporters only	262a.10	262.12(c)	H003
1				Subsequent notification requirements met	262a.12(b)		H004
1				Proper manifest used	262a.10	262.21	H005
1				Manifests filled out correctly and completely	262a.20		H006
1				Manifests signed and routed properly	262a.23(a)	262.23	H007
			4	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
		3		SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
		3		SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
		3		Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
		3		Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
1				Specified records retained for three years	262a.10	262.40(c)	H014
1				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
		3		Exception reporting procedures followed	262a.42	262.42	H016
		3		Spill reporting procedures followed	262a.10	262.34(d)	H017
1				PPC plan developed and implemented	262a.10	262.34(a)	H018
	2			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		3		Source reduction strategy prepared and available (LQG only)	262a.100		H020
		3		Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name B Brown Medical ID Number PAD 987679169 Date 02/20/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
			4	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
		3		Containers of hazardous waste in good condition	265a.1	265.171	H026
1				Containers and stored waste compatible	265a.1	265.172	H027
			4	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
		3		Containers managed to prevent leaks	265a.1	265.173(b)	H029
			4	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
			4	Container storage areas inspected at least weekly	265a.1	265.174	H031
		3		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
		3		Proper containment and collection systems in place	265a.179		H033
			4	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			4	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			4	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			4	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name B Braun Medical ID Number PAD98367911.9 Date 03/20/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 03/15/2001 Identification Number PAD 982679169
Company/Facility/Site Name B Braun Medical, Inc.

I conducted an inspection of B Braun Medical, Inc. on 03/15/2001 with Stephen Stancick, Wendy Boiss and David Lauer of the facility. B Braun Medical, a listed large quantity generator of hazardous waste, manufactures plastic disposable medical devices at this facility. A follow up site visit was conducted on March 7, 2001 to review site records. This report was completed at the facility on March 13, 2001.

During the February 20, 2001 site inspection, the hazardous waste accumulation storage area was inspected. The storage area was located on the east side of the facility, just outside of the main building. The storage area contained thirteen (13) 55 gallon drums of hazardous waste. In addition to the drums, approx. twelve (12) clear bags of hazardous waste (solvent bags) were laying on the ground next to the containment pallet used to hold hazardous waste solvent. The bags didn't have any hazardous waste or identification labels on them. Several of the bags were partially open. The layout of the storage area and debris such as pallets, made inspection of the drums difficult. The bags of solvent now blocked inspection of the drums in the containment pallet. The facility also placed empty containers in the storage pallet and a ~~bag of solvent~~ in the

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does knowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature]

Date 03/12/01

Inspector (signature) [Signature]

Date 03/12/2001

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 02/20/2001 Identification Number PAD982679169
Company/Facility/Site Name B Braun Medical, Inc.

The empty containers, in addition to a IUL (red bag) which was located between the two containers of hazardous waste solvent, prevented a full inspection of the drums of hazardous waste.

During the initial inspection on 02/20/2001, the Facility was unable to provide records documenting that the accumulation storage area was being inspected. During the followup visit on 03/07/2001, it was discovered that the Facility had not been conducting weekly inspections on the storage area since 10/16/2000. This was the last documented date in the inspection record for this area.

The Facility was unable to locate the current (latest) source reduction strategies for the hazardous waste streams. The Facility does have a company waste minimization plan and has reduced the quantity of hazardous waste generated. The Facility should insure source reduction strategies are completed for each hazardous waste stream. A copy of the source reduction strategies should be sent to this inspection.

The Facility should send this inspection documentation on the annual updates for the personnel ^{hazardous waste} ~~managing~~ ^{on} ~~managing~~.

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Person interviewed (signature) [Signature] Date 03/12/01
Inspector (signature) [Signature] Date 03/12/2001

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 02/20/2001 Identification Number PAD 982679169
Company/Facility/Site Name B Braun Medical, Inc.

The following containers were located in the
hazardous waste accumulation storage area on 02/20/2001:
twelve (12) bags 'Solvent bags' (bags without labels)
One (1) drum 'Trisodium Phosphate Crystalline'
labeled hazardous waste
dated 10/03/2000
One (1) drum 'Catch All Drum'
labeled hazardous waste
dated 11/29/2000
two (2) drums 'waste solvent'
(on container) labeled hazardous waste
(pallet) dated 1) 10/12/2000
2) 10/12/2000
Eight (8) drums 'Solvent bags'
labeled hazardous waste
dated 1) 10/03/2000
2) 10/05/2000
3) 12/17/2000
4) 12/19/2000
5) 12/29/2000
6) 1/5/2001
7) 1/17/2001
8) 1/31/2001
One (1) drum 'Expired Chemicals' (non-hazardous waste)
Seven (7) boxes 'I V bags' (returned product) non-hazardous

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does knowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 03/12/01
Inspector (signature) [Signature] Date 03/12/2001

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 02/20/2001 Identification Number PAD982679169
Company/Facility/Site Name B Braun Medical

Violations

- 1.) B Braun Medical accumulated hazardous waste onsite for more than 90 days in violation of 40 CFR Part 262.34(a) as incorporated by 25 PA code Chapter 262a.10. Five (5) drums of hazardous waste have been accumulating onsite for more than 90 days.
- 2.) B Braun Medical failed to manage containers of hazardous waste in compliance with 40 CFR Part 265 Subpart I and 25 PA code Chapter 265a Subchapter I in violation of 40 CFR Part 262.34 as incorporated by 25 PA code Chapter 262a.10. (see violation below)
- 3.) B Braun Medical failed to keep containers of hazardous waste closed except during addition or removal of waste in violation of 40 CFR Part 265.173(a) as incorporated by 25 PA code Chapter 265a.1. Several plastic bags of hazardous waste that contained solvent were partially open during the 2/20/2001 site inspection.
- 4.) B Braun Medical failed to insure proper container configuration and spacing for safe management and access for inspection purposes in violation of 25 PA code Chapter 265a.173. Bags of hazardous waste

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Person interviewed (signature) [Signature] Date 02/12/01
Inspector (signature) [Signature] Date 03/12/2001



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 02/25/2001 Identification Number PAD 982679169

Company/Facility/Site Name B Braun Medical Inc.

Violations (continue)

blocked aisles and access to containers of
hazardous waste in the accumulation storage area.

5.) B Braun Medical failed to inspect the
hazardous waste accumulation storage area weekly
in violation of 40 CFR Part 265.174 as incorporated
by 25 PA code Chapter 2650.1. The facility had not
been conducting weekly inspections of the storage area. The
last documented inspection of the storage area occurred
on October 16, 2000.

6.) B Braun Medical failed to insure that air
emission standards were being complied with (AA, BB, CC)
in violation of 40 CFR Part 265.178 as incorporated by
25 PA code Chapter 2650.1. Several bags of hazardous
waste solvent bags were partly open.

7.) B Braun Medical failed to clearly mark containers
of hazardous waste with accumulation dates in violation
of 40 CFR Part 262.34(a)(2) as incorporated by
25 PA code Chapter 2620.10. Approx. twelve (12) bags
of solvent bags lacked an accumulation date.

8.) B Braun Medical failed to label containers of
hazardous waste with a hazardous waste label.

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This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does knowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature]

Date 03/12/01

Inspector (signature) [Signature]

Date 03/12/2001



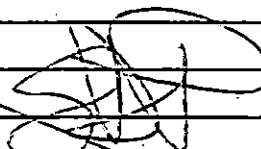
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 02/20/2001 Identification Number PAD 9826791A9
Company/Facility/Site Name B Braun Medical, Inc.Violations (continue)

in violation of 40 CFR Part 262.34 (a)(3) as incorporated
by 25 PA code Chapter 262a.10. Approx. twelve (12)
bags of solvent rags lacked a "hazardous waste"
label.

9.) B Braun Medical failed to accurately identify
the contents of containers of hazardous waste
stored in the accumulation area in violation of
SDWA 6018-403 (b)(2). Approx. twelve (12)
bags of solvent rags lacked any identification labels.



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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does knowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 03/12/01
Inspector (signature) [Signature] Date 03/12/2001



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 09/16/99Time Start 900Time Finish 1300

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name B Braun Medical, Inc. I.D. Number PAD 982679169
 Site Address 901 Maroon Blvd. Allentown, PA 18103
 County Lehigh Municipality Hanover Twp Zip 18103
 Name of Inspector Stephen Puzio
 Name & Title of Responsible Official Ed Brock, Senior Vice President of Manufacturing
 Person Interviewed Lisa Millington, Environmental Specialist Telephone (610) 266-0500
ext 2584
 Mailing Address (if different from above) SAME

Amount of Hazardous Waste Generated per Month: > 2200 Pounds 26,801 lbs/yr. from 1997 Biennial Report Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Dart Trucking License Number PA-AH 0219
 Transporter Name Freehold Contract, Inc. License Number PA-AH 0067
 Transporter Name Safety Klean Corp Systems License Number PA-AH 0172

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D008, D018	White parts cleaning solvent	Safety Klean Corp
D039, D040		PAD 980 552020
F002, F003, D001	White rags from manufacturing	Waste Technologies
		OHD 980613541
F002, F003, D001	waste alcohol and solvent	Chemical Conservation of GA
	from manufacturing	GAP 093380814
D009, D010	Mercury thermometers and	Environmental Enterprises
D011	waste from print shop	OHD 083377010

NERO

BDO via C. Gitschier

Central

U.S. EPA

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - SMALL QUANTITY GENERATORS

Site Name B Brown Medical ID Number PAN 982679169 Date 09/16/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1				Identification Number	262a.10	262.12	H002
1				Authorized transporters only	262a.10	262.12(c)	H003
1				Subsequent notification requirements met	262a.12(b)		H004
1				Proper manifest used	262a.10	262.21	H005
1				Manifests filled out correctly and completely	262a.20		H006
1				Manifests signed and routed properly	262a.23(a)	262.23	H007
1				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	2			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	2			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
1				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
1				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
1				Specified records retained for three years	262a.10	262.40(c)	H014
1				Biennial reports submitted to the Department (LQG only) <i>submitted 3/13/98</i>	262a.41	262.41	H015
	3			Exception reporting procedures followed	262a.42	262.42	H016
	3			Spill reporting procedures followed	262a.10	262.34(d)	H017
1				PPC plan developed and implemented <i>updated March 1999</i>	262a.10	262.34(a)	H018
	2			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
1				Source reduction strategy prepared and available (LQG only)	262a.100		H020
	3			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name B Brown Medical ID Number PA 982679169 Date 09/16/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
		3		Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
1				Containers of hazardous waste in good condition	265a.1	265.171	H026
1				Containers and stored waste compatible	265a.1	265.172	H027
1				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
1				Containers managed to prevent leaks	265a.1	265.173(b)	H029
1				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
1				Container storage areas inspected at least weekly	265a.1	265.174	H031
1				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
		3		Proper containment and collection systems in place	265a.179		H033
		3		Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
1				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
1				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
1				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name B Braun Medical ID Number PA0982679169 Date 09/16/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	2			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
			✓	Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	2			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059
			✓				



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Hazardous Waste Inspection Report Hazardous Waste Permit by Rule Facility

Company name B Braun Medical, Inc.
I.D. Number PAD 982679169

Determination of Applicability Required? 270a.60	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>
Documentation Available?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>
Does facility accept wastes from off-site for treatment in the PBR system?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
Does facility have an NPDES permit?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
If yes, NPDES Permit Number _____						
If no, does facility discharge to a sewage treatment system with an NPDES permit? If yes, NPDES Permit Number _____	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
If yes, does system meet all Federal, State and local pretreatment standards?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input checked="" type="checkbox"/>

If system does not directly discharge to a POTW or its own NPDES permitted discharge, explain here.

The wastewater (Ethylene Glycol and water) is sent to a
UST after neutralization. It is then shipped to Bass Oil
Company in Brooklyn for separation and reuse of ethylene glycol.

Site Name B Braun Medical E.N.U. ID Number PAD 982679169 Date 09/16/99

Hazardous Waste Inspection Report Hazardous Waste Permit by Rule Facility (WWTP)

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
1				Facility has applied for or received an EPA Hazardous Waste Identification Number	264a.1	264.11	H550
1				Active portion has 24 hour surveillance	264a.1	264.14(b)(1)	H551
1				Artificial barrier surrounds active portion	264a.1	264.14(b)(2)	H552
1				Proper signs are posted	264a.1	264.14(c)	H553
1				Inspections are conducted as per inspection plan	264a.1	264.14(b)(1)	H554
1				Inspection schedule is retained at facility	264a.1	264.15(b)(2)	H555
1				Deterioration and/or malfunctions of equipment corrected as revealed by inspections	264a.1	264.15 (c)	H556
1				Immediate remedial action taken when a hazard is imminent or already present	264a.1	264.15(c)	H557
1				Inspection log is maintained and utilized properly	264a.1	264.15 (d)	H558
1				Personnel training plan approved by DEP and implemented	264a.1	264.16 (a)	H559

X-5088

PAD 982679169

9/16/99

Hazardous Waste Inspection Report

Hazardous Waste Permit by Rule Facility (WWTP)

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
	2			Facility has NPDES permit if required	264a.1	264.16(d)(e)	H560
1				Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel	264a.1	264.32(a)	H561
1				Facility is capable of summoning outside emergency assistance	264a.1	264.32(b)	H562
1				Facility is equipped with fire, spill and decontamination control equipment	264a.1	264.32(c)	H563
1				Facility communication and/or alarm systems, and spill and decontamination control equipment is periodically tested and maintained	264a.1	264.33	H564
1				Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment	264a.1	264.35	H565
1				Current PPC plan, prepared and implemented in accordance with Department's guidelines. Copy available on site.	264a.1	264.51	H566
1				Designated primary emergency coordinator and is on-site or on call at all times	264a.1	264.55	H567

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 09/16/99 Identification Number PAD 982679169
Company/Facility/Site Name B Braun Medical, Inc.

I conducted an inspection of B. Braun Medical with Lisa Millington of the facility. B Braun Medical, a large quantity generator of hazardous waste, manufactures plastic disposable medical devices at this facility. Hazardous waste was being generated from cleaning and manufacturing of the medical devices. I toured the facility including the satellite accumulation areas, waste storage area and wastewater Permit by rule treatment area. The facility neutralizes ethylene oxide process waste under a elementary neutralization permit by rule. The Department determination for the permit by rule was issued on June 6, 1997. The facility has kept the old printing equipment as backup to the new computer imaging equipment. The facility has used the equipment once or twice in the last year. The facility purchased a new chemical storage shed in August 1999. All waste storage was moved outside of the shed at that time to ~~the surrounding area~~ ^{the surrounding area}. ~~It is recommended that the facility concrete the area around the chemical storage shed. The area should be sloped to prevent water from running into the area. The facility should insure that this area meets the requirements for the~~

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____
Inspector (signature) Stephen H. H. H. Date 09/16/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 09/16/99 Identification Number PAD982679169
Company/Facility/Site Name B Braun Medical

Storage of remitable waste. The Facility should also update the waste storage area inspection checklist.

Reviewed

manifests, including Land Ban restriction

1997 Biennial Hazardous waste report

Emergency plan

inspection checklist - waste storage area

other records

No Violation noted

SEP

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) David M. Hurlington

Date 9-16-99

Inspector (signature) Stephen H. Hurd

Date 9/16/99



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 06/02/98
Time Start 1345
Time Finish 1700

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name B. Braun Medical, Inc. I.D. Number PAD 982679169
Site Address 901 Marcon Blvd. Allentown, PA 18103
County Lehigh Municipality Hanover twp. ZIP 18103
Name of Inspector Stephen Puzio
Name & Title of Responsible Official George Burke, Vice President of Manufacturing
Person Interviewed Lisa Hillington, Envir. Affairs Coord. Telephone (610) 266-0500
Mailing Address (if different from above) SAME ext. 2584
Amount of Hazardous Waste Generated per Month: > 2200 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____
Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Safety Kleen Corp License Number PA-AH 0172
Transporter Name Dart Trucking Company License Number PA-AH 0219
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D008, D018	White parts cleaner solvent	Safety Kleen Corp
D039, D040		PAD 980552020
F002	Waste bags from	White Technologies
	Manufacturing Process	OHD 980613541
D002, D009	lab packs, printshop	Environmental Enterprises
D010	wastes	OHD 083377010
D001	waste alcohol and	Chemical Conservation GA
F003	waste solvent from Manufacturing	GAD 093380814

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 06/02/98

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
1				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
1				Containers of hazardous waste in good condition	265.171	H026
1				Containers and stored waste compatible	265.172	H027
1				Containers kept closed except during addition or removal of wastes	265.173	H028
1				Containers managed to prevent leaks	265.173(b)	H029
1				Containers labeled to accurately identify contents	265.173(c)	H030
1				Container storage areas inspected at least weekly	265.174	H031
1				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
1				Proper containment and collection systems in place	265.178(a)-(d)	H033
1				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
1				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
	3			Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
				Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
				Release reported to Department within 24 hours, unless exempted	265.196	H045
				Special requirements for ignitable and reactive wastes followed	265.198	H046
	V			SQ Generator complies with 265.201	262.34(e)(3)	H047

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

PAD 982679169
06/02/98

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation 40 CFR Part 268
1	2	3	4			
				Generators		
1				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
1				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
		3		Dilution not used as a substitute for treatment.		3
1				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
				Storage Facilities		
	2			Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
	↓			Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
	↓			Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, including PBR and RRR Facilities		
		3		Dilution not used as a substitute for treatment.		3
1				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
		3		Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
	2			Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
	↓			Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
	↓			Facility retains copies of generator notifications and certifications.		7(c)(1)

4085

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 06/02/98 Identification Number IPAD982679169
Company/Facility/Site Name B. Braun Medical, Inc.

I conducted an inspection of B. Braun Medical with Lisa Millington and Karen Zakszeski of B. Braun Medical. This facility, a large quantity generator of hazardous waste, manufactures plastic disposable medical devices at its Hammertop plant. Hazardous waste was generated from the cleaning and manufacturing of the medical devices. B. Braun has recently installed a new computer imaging device in the print shop. This device replaced the older equipment which generated a hazardous waste. The new imaging device does not generate any waste. The facility shipped the last of the print shop hazardous waste offsite today (6/2/98).

I toured the entire plant during the inspection including the waste accumulation shed and the waste PBR treatment area.

The facility neutralizes Ethylene Glycol process wastewater (hazardous waste) under a elementary neutralization PERMIT-BY-RULE (Chapter 265.433). The Department determined that B. Braun qualifies for permit BY RULE on June 6, 1997. The neutralized process waste water was ~~not~~ being shipped offsite to International Petroleum Corp. Reviewed.

Manifests, PPE plan* I left a copy of the PPE plan guideline with Lisa Millington. **NO VIOLATIONS NOTED**

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Lisa Millington Date 6/2/98
Inspector (signature) Stephen Penio Date 06/02/98



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

+ PAD992679160

05/04/97

INSTALLATION ADDRESS

SPADY MEDICAL INC

524 12TH AVE

BETHLEHEM, PA 18018

LESA HILLINGTON ENV AFFAIRS

301 MARCON BLVD

ALLENTOWN, PA 18103

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

MAY 1 1997

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(Complete item C)

C. Installation's EPA ID Number

P A D 9 8 2 6 7 9 1 6 9

II. Name of Installation (Include company and specific site name)

B. B R A U N M E D I C A L I N C

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

9 0 1 M A R C O N B L V D

Street (Continued)

City or Town

A L L E N T O W N

State

Zip Code

P A 1 8 0 1 8 - 1 8 1 0 3

County Code

County Name

0 3 9 L E H I G H

12
Per
Call

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

8 2 4 1 2 T H A V E N U E

City or Town

B E T H L E H E M

State

Zip Code

P A 1 8 0 1 8 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

M I L L I N G T O N

(First)

L I S A

Job Title

E N V I R O N M E N T A L A F F A I R S

Phone Number (Area Code and Number)

6 1 0 - 6 9 1 - 5 4 0 0

VI. Installation Contact Address (See Instructions)

A. Contract Address
Location Mailing Other☐☒☐

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

B B R A U N M E D I C A L I N C

Street, P.O. Box, or Route Number

8 2 4 1 2 T H A V E N U E

City or Town

B E T H L E H E M

State

Zip Code

P A 1 8 0 1 8 -

Phone Number (Area Code and Number)

6 1 0 - 6 9 1 - 5 4 0 0

B. Land Type

☐

C. Owner Type

☐D. Change of Owner
Indicator

Yes

☒

No

(Date Changed)

Month

Day

Year

Just a
name
12
per
call

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity

1. Generator (See Instructions)
☒ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (200-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see Instructions.
4. Hazardous Waste Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Boiler and/or Industrial Furnace
☐ 1. Smelter Deferral
☐ 2. Small Quantity Exemption
Indicate Type of Combustion Device(s)
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
☐ a. Utility Boiler
☐ b. Industrial Boiler
☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
☐ a. Transporter
☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
☐ a. Process
☐ b. Re-refine

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☒ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1 D 0 0 1	2 F 0 0 3	3 F 0 0 2	4 D 0 0 2	5 D 0 1 1	6 D 0 1 0
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (Type or print)

Lorraine J. LUCAS

Date Signed

5/4/97

XI. Comments

Director, Medical & Scientific Affairs
OTN: Burrton Medical Inc
BAA/12 5/3/97
USE ✓

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)